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Attorneys for Defendants
TeachBK, Inc., Ilya Kiselev
& Andrei Burtsev

Attorneys for Plaintiff
Miriam Goldberg

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Miriam Goldberg,

Plaintiff,

v.

TeachBK, Inc., *et al.*,

Defendants.

) Case No.: 3:24-cv-4525

)
) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER FOR REMOTE**
) **HEARING**

) Date: November 12, 2024

) Time: 10:30 a.m.

) Courtroom: Room G, 15th Floor

) Judge: Hon. Lisa J. Cisneros

Plaintiff Miriam Goldberg and Defendants TeachBK, Inc., Ilya Kiselev, and Andrey Burtsev (collectively, "Defendants") hereby agree and stipulate as follows:

The parties stipulate and jointly request that the hearing on Defendants' motion to strike Plaintiff's Complaint [ECF No. 28] scheduled for November 12, 2024 at 10:30 a.m. be held remotely. Alternatively, in the event the Court is disinclined to hold the hearing remotely, Plaintiff requests that her counsel, James Slater, be permitted to appear remotely. As grounds,

Mr. Slater is scheduled to have a surgical procedure on Friday, November 8, 2024, and will be recovering leading up to the hearing. Defendants do not oppose this alternative request.

IT IS SO STIPULATED.

Dated: November 7, 2024

Respectfully submitted,

SLATER LEGAL PLLC

By: /s/ James M. Slater

James M. Slater (*admitted pro hac vice*)

Attorney for Plaintiff Miriam Goldberg

LAW OFFICES OF ALLA V. VOROBETS

By: /s/ Alla V. Vorobets

Alla V. Vorobets (SBN 258586)

Attorney for Defendants TeachBK, Inc., Ilya Kiselev, and Andrei Burtsev

ATTESTATION OF CONCURRENCE

I, James M. Slater, am the ECF User whose ID and password are being used to file this **JOINT STIPULATION**. I attest that, pursuant to United States District Court, Northern District of California L.R. 5-1(i)(3), concurrence in the filing of this document has been obtained from counsel for Defendants. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 7, 2024

SLATER LEGAL PLLC

By: /s/ James M. Slater

James M. Slater (*admitted pro hac vice*)

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and good cause appearing, the Court ORDERS that the hearing on Defendants' motion to strike [ECF No. 28] be held remotely via Zoom on November 12, 2024 at 10:30 a.m.

Dated: November __, 2024

HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE